

REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant response. Claims 1-21 remain pending in the case. Claims 8 and 17 have been amended herein. No new matter has been added as a result of these amendments.

CLAIM REJECTIONS  
35 U.S.C. §102

Claims 1, 2, 6, 8 are rejected under 35 U.S.C. 102(e) as being anticipated by Huang et al. (US 20020133569), hereafter referred to as Huang. Applicant has reviewed the cited reference and respectfully submits that the embodiments of the present invention as recited in Claims 1, 2, 6, and 8 are not anticipated or suggested by Huang for the following rational.

Applicants respectfully direct the Examiner to amended Claim 1, which recites that an embodiment of the present invention is directed to (emphasis added):

A method for transcoding web-page content for a limited-display computing device comprising the steps of:

- a) upon receiving a web page request from a limited-display computing device, sending the web page request to a server computer that contains the requested web page document;
- b) receiving from said server computer a web page document that can be used to generate a display;
- c) searching said web page document for sequences of textual references to images that are directly adjoining;

- d) when said web page document includes a sequence of textual references to images that are directly adjoining, rendering each of the images represented by said textual references that are directly adjoining so as to generate a composite image;
- e) scaling each composite image rendered in step d) to meet the display requirements of said limited-display computing device; and
- f) sending each composite image scaled in step e) to said limited-display computing device.

Claims 2, 6, and 8 that depend from independent Claim 1 recite further limitations of the features of the embodiments of the present invention.

Huang and the claimed invention are very different. Applicants understand Huang to teach a system for processing transactions between a client device and a web page (Abstract). However, Huang fails to teach or suggest "generating a composite image from images that are directly adjoining," as claimed. In addition, Huang fails to teach or suggest "scaling a composite image to meet the display requirements of the limited-display device," as claimed.

Embodiments of the present invention are directed towards generating a composite image of adjoining images of a web page document and scaling the composite image such that the web page can be viewed on a limited-display device, similarly to the way it would be viewed on a full-size display. This is different from the teachings of Huang, which purports to teach matching the web page to XML fragments that conform to a particular transaction. With Huang, a user will not receive a scaled representation of the requested web page. In fact,

Huang teaches away from the claimed invention because a user of the system taught by Huang will receive an XML fragment instead of a scaled composite image, as claimed.

Furthermore, Huang fails to teach or suggest "searching a web page document for sequences of textual references to images that are directly adjoining," as claimed. Moreover, with Huang, a new rule could be applied to every web page document, (e.g., a step in a transaction) [0035]. This is very different from the claimed embodiment, which applies the same rule for each requested web page document (e.g., steps a-f of Claim 1). For this rational, Claim 1 is not anticipated by Huang. As such, Claim 1 is in condition for allowance and allowance of Claim 1 is earnestly solicited. Claims 2, 6, and 8 that depend from independent Claim 1 recite further limitations of the features of the embodiments of the present invention. Therefore, allowance of Claims 2, 6 and 8 is earnestly solicited.

35 U.S.C. §103

Claims 3-5, 9-11, 13-15 and 17-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Huang in view of Hawkins (US 20010032254), hereafter referred to as Hawkins. Applicant has reviewed the cited reference and respectfully submits that the embodiments of the present invention as recited in

Claims 3-5, 9-11, 13-15 and 17-20 are patentable over Huang in view of Hawkins for the following rational.

As presented above, Huang fails to teach or suggest "generating a composite image from images that are directly adjoining," as claimed. In addition, Huang fails to teach or suggest "scaling a composite image to meet the display requirements of the limited-display device," as claimed. Hawkins fails to remedy the deficiencies of Huang because Hawkins fails to teach or suggest these limitations as recited by the claimed embodiment. Applicant asserts that the combination of Huang and Hawkins fails to teach or suggest these claim limitations.

Applicant understands Hawkins to teach a method and system for wireless Internet access. Hawkins actually teaches away from the claimed limitations of the present invention by teaching that the proxy server filters all images, unless the user explicitly enables images [0112]. Hawkins filters images of a web page document while the present invention scales a composite image to meet the display requirements of the limited-display device," as claimed.

Furthermore, Hawkins teaches away from the claimed limitations of the invention by teaching "tables that are too wide to fit on the screen can be wrapped" [0115]. Wrapping a table teaches away from scaling an image that

represents a formatting object (e.g., table) to fit a limited-display device, as claimed. Hawkins fails to teach or suggest scaling a table (e.g., formatting object), as claimed.

Applicant respectfully asserts that nowhere does the combination of Huang and Hawkins teach, disclose or suggest the claimed embodiments of the present invention as recited in Claims 3-5, 9-11, 13-15 and that these claims are thus in a condition for allowance.

Claims 7, 16, 12, and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Huang in view of Robotham et al. (USPN 6,704,024), hereafter referred to as Robotham. Applicant has reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 7, 16, 12, and 21 are patentable over Huang in view of Robotham for the following rational.

As presented above, Huang fails to teach or suggest "generating a composite image from images that are directly adjoining," as claimed. In addition, Huang fails to teach or suggest "scaling a composite image to meet the display requirements of the limited-display device," as claimed. Robotham fails to remedy the deficiencies of Huang because Robotham fails to teach or suggest these limitations as recited by the claimed embodiment.

Applicant disagrees that it is prima facie obvious to generate the claimed invention in view of the cited art because neither Huang nor Robotham teach or suggest "generating a composite image from images that are directly adjoining," as claimed. In addition, Huang and Robotham, alone or in combination, fail to teach or suggest "scaling a composite image to meet the display requirements of the limited-display device," as claimed. Neither reference, alone, or in combination, teach or suggest these limitations of the claimed embodiment. For this rational, Claims 7, 16, 12, and 21 are patentable over Huang in view of Robotham. As such, allowance of Claims 7, 12, 16 and 21 is earnestly solicited.

### CONCLUSION

In light of the above listed remarks, reconsideration of the amended Claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 1-21 overcome the rejections and objections of record and, therefore, allowance of Claims 1-21 is earnestly solicited.

Should the Examiner have a question regarding the instant response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

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Dated: 1/10, 2005

A handwritten signature in black ink, appearing to read 'Anthony Murabito', written over a horizontal line.

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## DRAWINGS

The drawings are objected to as failing to comply with 37 CFR 1.84(p)(5) because they include the following reference characters not mentioned in the description: 700, 7b, 704. Applicant has amended the specification to include reference to the above-identified characters. As such, Applicant requests that the amendments be approved and the objections to the drawings be removed.

The drawings are objected to as failing to comply with 37 CFR 1.84(p)(5) because they include the following reference characters not mentioned in the description: 804. Applicant has amended the specification to include reference to the above-identified character. As such, Applicant requests that the amendments be approved and the objections to the drawings be removed.